

## **DISCOVERY PLAN WORKSHEET**

### **Phase I (Pre-Settlement Discovery)**

Deadline for completion of Rule 26(a) initial disclosures  
and HIPAA-complaint records authorizations: 8/9/2016

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Completion date for Phase I Discovery  
as agreed upon by the parties: 9/26/2016  
*(Reciprocal and agreed upon document production  
and other discovery necessary for a reasoned consideration  
of settlement. Presumptively 60 days after Initial Conference.)*

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Status conference date TBD by the Court:  
*(Generally 15 days post Phase I Discovery)* \_\_\_\_\_

### **Phase II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings:  
*(Presumptively 15 days post status conference)* 8/8/2016

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First requests for production of documents  
and for interrogatories due by: 11/11/2016  
*(Presumptively 15 days post joining/amending)*

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All fact discovery completed by: 4/27/2017  
*(Presumptively 3.5 months post first  
requests for documents/interrogatories )*

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Exchange of expert reports completed by: n/a  
*(Presumptively 30 days post fact discovery)*

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Expert depositions completed by: n/a  
*(Presumptively 30 days post expert reports)*

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Final date to take first step in dispositive motion practice:  
*(Parties are directed to consult the District Judge's  
individual rules regarding such motion practice.  
Presumptively 30 days post expert depositions)* 5/26/2017

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**COMPLETION OF ALL DISCOVERY BY:** **4/27/2017**  
*(Presumptively 9 months after Initial Conference)*

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Submission of joint pre-trial order: 6/26/2017

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Final Pre-Trial Conference TBD by the Court: \_\_\_\_\_